



# FACILITY COMPLIANCE AUDIT REPORT

## Division of Waste Management Solid Waste Section

<b>UNIT TYPE: (check all that apply to this audit with same Permit number)</b>											
Lined MSWLF	<b>X</b>	LCID		YW		Transfer		Compost		SLAS	<b>COUNTY:</b> Davidson <b>PERMIT NO.:</b> 29-06 <b>FILE TYPE:</b> COMPLIANCE
Closed MSWLF		HHW	<b>X</b>	White goods	<b>X</b>	Incineration		T&P		FIRM	
CDLF	<b>X</b>	Tire T&P / Collection		Tire Monofill		Industrial Landfill		DEMO		SDTF	

Date of Audit: 10/17/08.

Date of Last Audit: 09/17/08

**FACILITY NAME AND ADDRESS:**

Davidson County Integrated Solid Waste Facility  
 220 Davidson County Landfill Road  
 Lexington, N.C. 27292

**GPS COORDINATES: (Decimal Degrees) N:** 35.85281 **E:** 80.17620

**FACILITY CONTACT NAME AND PHONE NUMBER:**

Charles Brushwood, Solid Waste Director  
 Office- 336-242-2284  
 Cell- 336-240-0303  
 e-mail- charlie.brushwood@davidsoncountync.gov

**FACILITY CONTACT ADDRESS (IF DIFFERENT):**

Davidson Solid Waste Management  
 1242 Old U.S Highway 29  
 Thomasville, North Carolina 27360

**AUDIT PARTICIPANTS:**

Charles Brushwood, Davidson County Solid Waste  
 Director  
 Hugh Jernigan, N.C. Solid Waste Section

**STATUS OF PERMIT:**

Original Permit to Construct issued September 28, 1994 (Phase 1, MSW Unit)  
 Original Permit to Operate issued January 17, 1995 (MSW Unit, Phase 1, Area 3)  
 Permit Renewal issued August 21, 1995  
 Permit to Operate issued March 13, 1996 (MSW Unit, Phase 1, Area 1)  
 Permit to Operate issued May 30, 2000 (MSW Unit, Phase 1, Area 2, Cell 1)  
 Permit to Operate issued June 22, 2001 (HHW Facility)  
 Permit to Operate issued November 20, 2001 (C&D Landfill Unit, Phase 1)  
 Permit Modification issued May 15, 2002 (Mobile Home Deconstruction for C&D Landfill and Alternative Daily Cover for MSW Landfill)  
 Permit to Operate issued June 24, 2003 (MSW Unit, Phase 1, Area 2, Cell 2)  
 Permit to Operate issued March 17, 2006 (C&D Landfill Unit, Phase 2)  
 Permit to Construct issued September 28, 2007 (Phase 2 Area 1)  
**Permit Review Date May 30, 2010.**

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**PURPOSE OF AUDIT:**

**Follow-up Audit-** Evaluation of corrective actions concerning Notice of Violation resulting from comprehensive audit of September 17, 2008

**NOTICE OF VIOLATION(S) (citation and explanation):**

NONE

You are hereby advised that, pursuant to N.C.G.S. 130A-22, an administrative penalty of up to \$15,000 per day may be assessed for each violation of the Solid Waste Statute or Regulations. If the violation(s) noted here continue, you may be subject to enforcement actions including penalties, injunction from operation of a solid waste management facility or a solid waste collection service and any such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules.

**STATUS OF PAST NOTED VIOLATIONS (List all noted last audit):**

**The Comprehensive Landfill Audit conducted on 09/17/08 resulted in the following violations of 15A North Carolina Administrative Code 13B .1626:**

1. 15A North Carolina Administrative Code 13B .1626 (2) (a) "... the owners or operators of all MSWLF units must cover disposed waste with six inches of earthen material at the end of each operating day, or at more frequent intervals if necessary, to control disease vectors, fires, odors, blowing litter and scavenging."

***Insufficient daily cover and exposed waste was observed in Areas 1 and 2 (see items 32-37 in Areas of Concern and Comments Section).***

2. 15A North Carolina Administrative Code 13B .1626 (2) (c) "Areas which will not have additional waste placed on them for 12 months or more, but where final termination of disposal operations has not occurred, shall be covered with a minimum of one foot of intermediate cover."

***Insufficient intermediate cover was observed in Areas 1 and 2 (see items 32-37 in Areas of Concern and Comments Section).***

"32". Additional soil cover is required on all areas of the landfill that that have exposed waste or eroded (see specifics below).

"33". Side slope erosion and exposed waste was noted in Areas 1 and 2. The edge of liner demarcation was difficult to locate due to erosion and silt and the storm water ditch system at the base of the side slopes in active Areas 1 and 2 were heavily silted. Storm water diversion techniques and provisions for vegetative cover should be implemented to control excessive on-site erosion.

"34". Working face was noted to be larger than recommended, and effective compaction was not occurring at the edge of the working face (opposite of the tipping deck area) due to the configuration of the working face. **Areas of exposed waste near the working face requires additional soil cover.** The large size of the working face may cause difficulties in meeting daily cover requirements.

"35". The last approximately 400 feet of the access road inside the landfill to the working face was difficult to navigate by incoming waste vehicles due to mud resulting from recent rain events. Some waste vehicles were requiring assistance from landfill personnel to ingress and egress the site. Observed incoming waste vehicles dumping waste loads 200-300 feet from the working face, and the waste had to be pushed by landfill equipment to the working face. This activity was disturbing soil cover and exposing waste. **Additional soil cover and/or other roadway stabilizing materials should be immediately placed in the area of the working face tipping deck and incoming roadway to the working face to affect all weather road ways and cover exposed waste.**

"36". Unused access roads inside the landfill require additional soil cover due to erosion and exposed waste.

"37". The currently unused access road on the north side of the landfill in the general area of the junction of Area 3 and Area 1 (near the leachate lagoon) was noted to have excessive erosion with no soil cover in place. There was evidence of storm water coming in contact with waste and potentially flowing down the access road and past the edge of the liner system. This area should be repaired immediately.

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#### AREAS OF CONCERN AND COMMENTS:

1. The facility consists of a MSW landfill, C&D landfill, HHW collection facility, tire collection site, white goods collection and processing facility, a metals collection site, a waste drop-off convenience area for cars and small trucks, a swap shop area, household textiles recycling area, electronics recycling site, a drop-off convenience area for selected recyclables, and a material recovery facility for collected recyclables.
2. Conducted a follow-up audit to evaluate corrective measures for the Notice of Violation issued as a result of the September 17, 2008 Comprehensive Landfill Audit.
3. Additional soil cover has been applied to the MSW landfill in Area 1 and Area 2. Intermediate cover appears to exceed the required one foot in all areas. Side slopes in Area 1 and Area 2 have been re-graded to allow for the more efficient handling of storm water. No exposed waste or side slope erosion was observed. Approximately 17 acres (south facing and west facing side slopes) have been seeded and 7 additional acres on the north facing side slopes are prepared for seeding when weather allows. The remainder of the seeding is expected to be conducted within a week.
4. All ditches for storm water removal have been cleaned and conformed to allow for the effective flow of storm water.
5. The working face for the MSW landfill was found to be well delineated and compacted. The current working face was found to be approximately 100 ft. by 150 ft. Adequate soil cover observed from previous daily operations.
6. All interior access roads have been repaired and re-graded. The interior access road to the working face has been stabilized to allow for the effective traffic movement of incoming waste loads. Incoming vehicles were able to dump loads directly at the working face and exit without assistance. The unused access roads at the summit on Areas 1 and 2 have also been seeded.
7. The side slopes in the general location of Area 1 and Area 3 has been repaired, compacted, and has additional soil placed in preparation for seeding (site referred to in item 37 and item 41, in the audit report of September 17, 2008).
8. Mowing has been conducted on the closed Area 3, as recommended.
9. Observed the C&D landfill operations. Additional soil cover has been placed over the north facing side slopes as requested. Additional stockpiles of soil for weekly cover were observed near the working face.
10. Photos were taken at the MSW and C&D landfills.
11. Discussed the random inspection program. Training is being prepared for Davidson County Landfill personnel responsible for conducting waste screenings as recommended in the September 17, 2008 audit report. The county will notify the Solid Waste Section when the training is complete.
12. Discussed operations at the Household Hazardous Waste (HHW) Facility. The HHW Facility is modifying the Operational Plans to reduce the hours of operation. The county is looking into having citizens bringing in the HHW by appointment. Suggest the county check with the Solid Waste Permitting Section concerning incorporating the minor Operational Plans changes into the next permit issuance for the Permit to Operate, Phase 2.
13. The facility was found to have corrected the deficiencies noted in the September 17, 2008 Comprehensive Landfill Audit.

Please contact me if you have any questions or concerns regarding this audit report.

Hugh Jernigan

*Hugh Jernigan*  
Regional Representative

Phone: 336-771-5093

Distribution: original signed copy to facility -- signed copy to compliance officer -- e-mail or copy to super

Delivered on : 10/21/08 by		e-mail	X	US Mail		Certified No. [ ]
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